UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

ALLSTATE INSURANCE COMPANY, et al.,

Plaintiffs,

v.

EPIONE MEDICAL, P.C., et al.,

Defendants,

Index No. 21-cv-03970-BMC

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and proceedings in this matter, Defendant Ruslan Nektalov moves this Court for an Order pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) to dismiss Plaintiffs' Complaint.

Dated: Brooklyn, NY

October 12, 2021

By: Nicholas Bowers, Esq.

/s/

Gary Tsirelman, P.C. Attorneys for Defendants Named Herein 129 Livingston Street 2nd and 3rd Floors Brooklyn, NY 11201 (718) 438-1200